



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

Melissa Armstrong
Trial Counsel
Division of Enforcement
Tel: (202) 551-4724
Email: Armstrongme@sec.gov

October 16, 2024

BY ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

Re: *SEC v. Robert Lenard Booth, et al.*, 1:22-cv-01115-JHR

Dear Judge Rearden,

Plaintiff Securities and Exchange Commission files this status report to notify the Court of its continuing efforts to resolve this matter.

The SEC has learned that on September 10, 2024, Defendant Robert Lenard Booth a/k/a Trevor Nicholas passed away. The SEC expects to take appropriate steps to resolve its claims against Booth in the coming weeks.

The SEC has been in contact with almost all the remaining Defendants regarding a potential resolution of the SEC's claims against them. One has agreed to resolve, and the SEC is continuing its efforts to resolve with two additional Defendants, which appear promising. If those efforts are unsuccessful, however, the SEC expects to request a Clerk's Certificate of Default against them.

The SEC has not received any response from Defendant Chiaramonte. On September 17, 2024, the Acting Clerk of the Court issued a Certificate of Default against her. The SEC anticipates it will move for default judgment against any non-settling defendants.

Before the SEC can move the Court for default judgment, approval of any settlement, or dismissal, as appropriate, counsel will need to engage in some internal processes, which may take several weeks.

The SEC may file an additional update, if necessary, in 90 days.

Respectfully submitted,

/s/ Melissa Armstrong
Melissa Armstrong
100 F St., N.E.
Washington, D.C. 20549
(202) 551-4724
armstrongme@sec.gov

cc: All Defendants, by mail at their respective last known addresses